Docket #0339 Date Filed: 09/18/2026

THIS SECOND OMNIBUS OBJECTION SEEKS TO DISALLOW CERTAIN PROOFS OF CLAIM. CLAIMANTS RECEIVING THIS OBJECTION SHOULD LOCATE THEIR NAMES AND CLAIMS ON SCHEDULE 1 THROUGH SCHEDULE 6 ATTACHED TO THE PROPOSED ORDER.

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UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

In re: 1 THRASIO ONE, INC., Reorganized Debtor.[1]	Chapter 11 Case No. 24-11850 (CMG) **Hearing Date:** **October 20, 2026** **Hearing Time:** **10:00 a.m. (ET)** **Response Deadline:** **October 13, 2026**

SECOND OMNIBUS OBJECTION OF THE THRASIO LEGACY TRUST TO CERTAIN PROOFS OF CLAIM (LATE-FILED, AMENDED AND SUPERSEDED, NO LIABILITY, INSUFFICIENT DOCUMENTATION, SATISFIED, AND DUPLICATIVE CLAIMS)

The Thrasio Legacy Trust (the "Trust"), by and through META Advisors LLC, solely in its capacity as trustee of the Trust (the "Trustee"), hereby submits this objection (this "Objection") and respectfully requests entry of an order, substantially in the form attached hereto

[1] The last four digits of Reorganized Debtor's tax identification number are 4771. The Reorganized Debtor's service address for purposes of this chapter 11 case is 85 West Street, 3rd Floor, Walpole, MA, 02081.

2411850260918000000000001

as **Exhibit A** (the "Proposed Order"), disallowing and expunging each proof of claim identified on **Schedules 1 – 6** to the Proposed Order (collectively, the "Disputed Claims," and the related claimants, the "Claimants"), because the Disputed Claims either (i) were late-filed; (ii) were amended and superseded by later filed proofs of claim; (iii) do not establish a liability owed by the Debtors; (iv) were filed without sufficient documentation to support the claim; (v) were otherwise satisfied; or (vi) were duplicative of other claims. In support of this Objection, the Trust submits the *Declaration of Dana P. Kane in Support of the Second Omnibus Objection of the Thrasio Legacy Trust to Certain Proofs of Claim* (the "Kane Declaration"), attached hereto as **Exhibit B**. In further support of this Objection, the Trust states as follows:

JURISDICTION AND VENUE

1. The United States Bankruptcy Court for the District of New Jersey (the "Court") has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334 and the *Standing Order of Reference to the Bankruptcy Court Under Title 11* of the United States District Court for the District of New Jersey, entered July 23, 1984, and amended on September 18, 2012 (Simandle, C.J.). The Trust confirms its consent to the Court entering a final order in connection with this Objection to the extent that it is later determined that the Court, absent consent of the parties, cannot enter final orders or judgments in connection herewith consistent with Article III of the United States Constitution.

2. Venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

3. The statutory basis for the relief sought herein is section 502(b) of title 11 of the United States Code (the "Bankruptcy Code"), rule 3007 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), and rule 3007-2 of the Local Rules of the United States Bankruptcy Court for the District of New Jersey (the "Local Rules"). This Objection complies in all respects with Local Rules 3007-1 and 3007-2.

BACKGROUND

A. Case Background

4. On February 28, 2024 (the "Petition Date"), Thrasio Holdings, Inc. and certain of its affiliates (the "Debtors") commenced with this Court voluntary cases under chapter 11 of the Bankruptcy Code. In accordance with the *Order Pursuant to Fed. R. Bankr. P. 1015(b) Directing Joint Administration of Related Chapter 11 Cases*, the Debtors' cases were jointly administered pursuant to Bankruptcy Rule 1015 under Case No. 24-11840 (the "Main Case") until the closure of all of the Debtors' cases other than the chapter 11 case of 1 Thrasio One, Inc.[2] The Debtors continued to operate their businesses and manage their assets as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code until the Effective Date of the Plan (as defined below).

5. On April 1, 2024, each of the Debtors filed their respective schedules of assets and liabilities (as amended, the "Schedules") pursuant to Bankruptcy Rule 1007.[3]

6. On June 13, 2024, the Court entered its *Findings of Fact, Conclusions of Law, and Order Confirming the First Amended Joint Plan of Reorganization of Thrasio Holdings, Inc. and its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code* (the "Confirmation Order")[4] confirming the *First Amended Joint Plan of Reorganization of Thrasio Holdings, Inc. and its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code*

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2 Main Case, Docket Nos. 64, 1983.

3 *See* Main Case, Docket No. 280 (Schedules of Thrasio Holdings, Inc.).

4 Main Case, Docket No. 1124.

(as amended and supplemented, the "Plan").[5] On June 18, 2024 the Plan became effective (the "Effective Date").[6]

7. By operation of the Plan and the Confirmation Order, the Trust was created in accordance with the terms of the *Thrasio Legacy Trust Agreement and Declaration of Trust* (the "Trust Agreement" and, together with the Plan and Confirmation Order, the "Plan Documents") on the Effective Date.[7] Pursuant to the Plan Documents, the Trust has the sole authority to file and prosecute objections to General Unsecured Claims that are not First Lien Deficiency Claims.[8] The Trust also has the authority to settle, compromise, withdraw, litigate to judgment or otherwise resolve objections to General Unsecured Claims.[9]

8. Pursuant to Paragraph 70 of the Confirmation Order, holders of Allowed General Unsecured Claims are entitled to (a) a single Claim with respect to any particular debt owed and (b) a single distribution under the Plan on account of their Allowed General Unsecured Claims, regardless of which Debtor was originally liable for such Claims.[10] Additionally, "any and all General Unsecured Claims based on joint and several liability or a guaranty by one or more Debtor(s) shall be deemed eliminated and extinguished."[11]

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5 Main Case, Docket No. 398, and as subsequently amended. Capitalized terms used but not defined herein shall have the meanings ascribed to them in the Plan.

6 Main Case, Docket No. 1143.

7 Plan, § IV.J.

8 *Id.*, § VII.B.

9 *Id.*

10 Confirmation Order, ¶ 70.

11 *Id.*

B. Claims Reconciliation Background

9. On April 4, 2024, the Court entered an order establishing certain dates and deadlines for filing proofs of claim in the Debtors' chapter 11 cases.[12] Specifically, the Court established (i) May 6, 2024, as the general bar date applicable to all persons and entities asserting a Claim (as defined in section 101(5) of the Bankruptcy Code) against the Debtors that arose on or prior to the Petition Date (the "General Bar Date"); and (ii) September 4, 2024 as the deadline for Governmental Units to file proofs of claim against the Debtors that arose on or prior to the Petition Date (the "Governmental Bar Date").[13] Pursuant to the Plan Documents, the Court also established July 18, 2024 as the deadline for filing a proof of claim for claims arising from the rejection of any executory contract or unexpired lease pursuant to the Plan or Confirmation Order (the "Rejection Bar Date," and together with the General Bar Date and Governmental Bar Date, the "Bar Dates").[14]

10. Pursuant to the Plan Documents, the Trust and its professionals have been diligently reviewing and analyzing General Unsecured Claims that are not First Lien Deficiency Claims. In connection therewith, the Trust sought and obtained approval of certain omnibus claims objection procedures (the "Omnibus Objection Procedures") which, inter alia, approved omnibus objection procedures for these cases and authorized the filing of omnibus objection on additional grounds besides those specified in Bankruptcy Rule 3007(d).[15]

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12 Main Case, Docket No. 292.

13 *Id.*

14 Plan, § V.C.

15 *Order (I) Approving Omnibus Claims Objection Procedures; and (II) Authorizing the Thrasio Legacy Trust and Reorganized Debtors to File Substantive Omnibus Objections to Claims Pursuant to Bankruptcy Rule 3007(c) and (d)* [Docket No. 318].

11. On March 13, 2026, the Trust filed the *First Omnibus Objection of the Thrasio Legacy Trust to Certain Proofs of Claim (Late-Filed, Amended, Duplicative, Satisfied and Equity)* (the "First Omnibus Objection"),[16] wherein the Trust sought to disallow claims on the grounds that they were (i) late-filed, (ii) amended by later proofs of claim, (iii) duplicative of other claims, (iv) satisfied, or (v) equity interests that were cancelled and extinguished as of the Effective Date and not entitled to a recovery under the Plan. On April 10, 2026, the Court entered an order sustaining the Trust's First Omnibus Objection, disallowing 53 General Unsecured Claims asserting an aggregate amount of approximately $55 million, plus unliquidated amounts.[17]

RELIEF REQUESTED

12. By this Objection and for the reasons described below, the Trust requests entry of the Proposed Order disallowing and expunging the Disputed Claims identified on **Schedules 1 – 6** to the Proposed Order.

BASIS FOR RELIEF

13. When asserting a proof of claim against a bankrupt estate, a claimant must allege facts that, if true, would support a finding that the debtor is legally liable to the claimant.[18] To receive the benefit of *prima facie* validity, the proof of claim must "set forth facts necessary to support the claim."[19] Where the claimant alleges sufficient facts to support its claim, the claim is afforded *prima facie* validity.[20]

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16 *First Omnibus Objection of the Thrasio Legacy Trust to Certain Proofs of Claim (Late-Filed, Amended, Duplicative, Satisfied and Equity)* [Docket No. 311].

17 Docket No. 316.

18 *In re Allegheny Int'l, Inc.*, 954 F.2d 167, 173 (3d Cir. 1992).

19 *In re Stoecker*, 143 B.R. 879, 883 (N.D. Ill. 1992).

20 *See In re Allegheny Int'l, Inc.*, 954 F.2d at 173.

14. Section 502(a) of the Bankruptcy Code provides, in pertinent part, that "[a] claim or interest, proof of which is filed under section 501 of this title, is deemed allowed, unless a party in interest . . . objects."[21] Thus, while a properly-filed proof of claim is *prima facie* evidence of the claim's allowed amount, when an objecting party presents evidence to rebut a claim's *prima facie* validity, the claimant bears the burden of proving the claim's validity by a preponderance of evidence.[22] The burden of persuasion with respect to the claim is always on the claimant.[23] The failure to allege facts and to provide sufficient support for a claim deprives the claim of *prima facie* validity.[24]

15. Bankruptcy Rule 3007, in turn, requires that an objection to a proof of claim be made in writing, and the claimant be provided with not less than thirty days' notice of the hearing to be held in respect of such objection.[25] Objections of up to one hundred claims may be joined in an omnibus objection if such objections are based on the grounds that the claims should be disallowed, in whole or in part, for any of eight enumerated reasons, including that they duplicate other claims, have been amended by later proofs of claim, were not timely filed, or have been satisfied or released during the bankruptcy case.[26]

16. In addition to the grounds for objection established under Bankruptcy Rule 3007, the Omnibus Objection Procedures permit the Trust to join up to one hundred claims in an omnibus objection where such objections are based on other grounds, including that they are

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21 11 U.S.C. § 502(a).

22 *See In re Allegheny Int'l, Inc.*, 954 F.2d at 173–74.

23 *See, e.g.*, *Biolitec, AG v. Cyganowski*, No. 13-cv-5864, 2013 WL 6795400, *3 (D. N.J. Dec. 16, 2013); *see also In re Allegheny Int'l, Inc.*, 954 F.2d at 173–74.

24 *See, e.g., In re Jorczak*, 314 B.R. 474, 481–82 (Bankr. D. Conn. 2004) (discussing the evidentiary requirements and burden of proof with respect to the allowance of claims).

25 *See* Fed. R. Bankr. P. 3007(a).

26 Fed. R. Bankr. P. 3007(d).

inconsistent with Debtors' books and records, fail to specify asserted claim amount, fail to specify the basis of the claim or provide sufficient supporting documentation in support of the claim, or seek recovery of amounts for which the Debtors are not liable.[27]

17. Section 502(b)(1) of the Bankruptcy Code additionally provides, in part, that a claim may not be allowed to the extent that it "is unenforceable against the debtor and property of the debtor, under any agreement or applicable law."[28] Section 502(b)(9) further states that a claim shall not be allowed "to the extent that . . . proof of such claim is not timely filed . . . ."[29]

18. For the reasons set forth below, there is ample evidence to rebut the *prima facie* validity of each Disputed Claim.

A. Late-Filed Claims

19. The Trust submits that each of the claims identified on **Schedule 1** to the Proposed Order (the "Late-Filed Claims") should be disallowed because: (i) the Late-Filed Claims were filed after the applicable Bar Date; and (ii) the Trust is unaware of any motions seeking leave to file any such Late-Filed Claims or any other agreement with respect to the time of filing such Late-Filed Claims. Moreover, if the Late-Filed Claims are not eliminated, the claims of other stakeholders will be negatively impacted in the calculation of the recovery available to general unsecured creditors under the Plan.

20. Therefore, the Trust seeks entry of the Proposed Order disallowing the Late-Filed Claims set forth in **Schedule 1** to the Proposed Order.

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27 Docket No. 318.

28 11 U.S.C. § 502(b)(1).

29 11 U.S.C. § 502(b)(9); *see also Berger* v. *Trans World Airlines, Inc.* (*In re Trans World Airlines, Inc.*), 96 F.3d 687, 690 (3d Cir. 1996) ("The bar date means just that; it is a 'drop-dead date' that bars all prepetition claimants who received the required notice").

B. Amended and Superseded Claims

21. The Trust submits that each of the claims identified on **Schedule 2** to the Proposed Order, in the column labeled "Amended Claim No." (the "Amended and Superseded Claims") was expressly amended and superseded by another claim, in the column labeled "Surviving Claim No."

22. Failure to disallow the Amended and Superseded Claims could result in the applicable Claimants receiving an unwarranted and duplicate recovery on account of the same claim. The Trust notes that the Claimants will not be prejudiced if their Amended and Superseded Claims are disallowed because the Claimants will receive the appropriate treatment due to them under the Plan based on the status of their respective "Surviving Claims" also identified on **Schedule 2** to the Proposed Order.[30] Moreover, if the Amended and Superseded Claims are not eliminated, the claims of other stakeholders will be negatively impacted in the calculation of the recovery available to general unsecured creditors under the Plan.

23. Therefore, the Trust seeks entry of the Proposed Order disallowing the Amended and Superseded Claims set forth in **Schedule 2** to the Proposed Order.

C. No Liability Claims

24. The Trust submits that each of the claims identified on **Schedule 3** to the Proposed Order (the "No Liability Claims") should be disallowed because: (i) the Trust cannot ascertain a basis for such claim after a reasonable review of the Debtors' books and records and/or (ii) the documentation attached to such claim, if any, does not provide *prima facie* evidence of the validity and amount of the claim. Moreover, the failure to disallow the No Liability Claims will

[30] As the claims reconciliation process is ongoing, the Trust reserves all rights to object to any Surviving Claim on any grounds.

result in the holders of the No Liability Claims receiving a recovery from the Trust to which they are not entitled, to the detriment of holders of valid unsecured claims.

25. The reasons for objecting to each No Liability Claim are more-fully set forth under the "Reason for Disallowance" column on **Schedule 3** to the Proposed Order.

26. Therefore, the Trust seeks entry of the Proposed Order disallowing the No Liability Claims set forth in **Schedule 3** to the Proposed Order.

D. Insufficient Documentation Claims

27. The Trust submits that each of the claims identified on **Schedule 4** to the Proposed Order (the "Insufficient Documentation Claims") lack necessary supporting documentation for the existence and/or amount of the underlying claim. As such, each Insufficient Documentation Claim lacks *prima facie* validity.

28. Moreover, if the Insufficient Documentation Claims are not eliminated, the claims of other stakeholders will be negatively impacted in the calculation of the recovery available to general unsecured creditors under the Plan.

29. The reasons for objecting to each Insufficient Documentation Claim are more-fully set forth under the "Reason for Disallowance" column on **Schedule 4** to the Proposed Order.

30. Therefore, the Trust requests that the Court enter an order disallowing the Insufficient Documentation Claims identified on **Schedule 4** to the Proposed Order.

E. Satisfied Claim

31. The Trust submits that the claims identified on **Schedule 5** to the Proposed Order (the "Satisfied Claims") should be disallowed because, after reasonable review, the Trust determined that the claims were satisfied by assumption of the underlying executory contract or unexpired lease.

32. Failure to disallow the Satisfied Claims could result in the applicable Claimant receiving an unwarranted and duplicate recovery on the amount of the same claim. Moreover, if the Satisfied Claims are not eliminated, the claims of other stakeholders will be negatively impacted in the calculation of the recovery available to general unsecured creditors under the Plan.

33. Therefore, the Trust requests that the Court enter an order disallowing the Satisfied Claims identified on **Schedule 5** to the Proposed Order.

F. Duplicative Claims

34. The Trust submits that the claims identified on **Schedule 6** to the Proposed Order (the "Duplicative Claims") should be disallowed because such claims are identical or duplicative of another claim asserting the same liability in the same amount and priority identified on **Schedule 6** in the column labeled "Surviving Claim No." Pursuant to paragraph 70 of the Confirmation Order (i) holders of Allowed General Unsecured Claims are only entitled to a single claim with respect to any particular debt owed, and (ii) claims asserted against multiple Debtors based on joint and several liability or a guaranty are deemed eliminated and extinguished.

35. Failure to disallow the Duplicative Claims could result in the applicable Claimant receiving an unwarranted and duplicate recovery on the amount of the same claim. Moreover, if the Duplicative Claims are not eliminated, the claims of other stakeholders will be negatively impacted in the calculation of the recovery available to general unsecured creditors under the Plan. The Trust notes that the Claimants will not be prejudiced if the Duplicative Claims are disallowed, because the Claimants will retain their surviving claim also identified on **Schedule 6** to the Proposed Order in the column labeled "Surviving Claim No." [31]

[31] As the claims reconciliation process is ongoing, the Trust reserves all rights to object to any Surviving Claim

36. Therefore, the Trust requests that the Court enter an order disallowing the Duplicative Claims identified on **Schedule 6** to the Proposed Order.

RESERVATION OF RIGHTS

37. The Trust hereby reserves the right to amend, modify, and supplement this Objection, prior to the hearing before the Court on this Objection, if any; *provided*, *however*, that nothing in this Objection shall affect the Trust's right to object to any Disputed Claim identified on **Schedules 1 – 6** to the Proposed Order or any other proof of claim at a future date on a basis other than as set forth in this Objection as permitted by bankruptcy or nonbankruptcy law, subject to any limitations set forth in the Local Rules or in the Proposed Order.

38. Notwithstanding anything to the contrary herein, nothing contained in this Objection or any actions taken pursuant to any order granting the relief requested by this Objection is intended or should be construed as (a) an implication or admission as to the amount of, basis for, or validity of any particular claim against the Debtors under the Bankruptcy Code or other applicable nonbankruptcy law; (b) a waiver of the Trust's or any other party in interest's rights to dispute any particular claim on any grounds; (c) a promise or requirement to pay any particular claim; (d) an implication, admission, or finding that any particular claim is an administrative expense claim, other priority claim or otherwise of a type specified or defined in this Objection or any order granting the relief requested by this Objection; (e) a modification of the assumption or rejection of any lease or executory contract as set forth in the Confirmation Order and Plan; or (f) a waiver or limitation of the Trust's, or any other party in interest's, claims, causes of action, or other rights under the Bankruptcy Code or any other applicable law.

on any grounds.

STATEMENT OF COMPLIANCE WITH LOCAL RULES

39. Counsel for the Trust has reviewed the requirements of Local Rule 3007-1 and certifies that this Objection substantially complies with such Local Rule. To the extent that the Objection does not comply in all respects with the requirements of Local Rule 3007-1, the Trust believes such deviations are not material and respectfully request that any such requirement be waived. The Trust, in compliance with Local Rule 3007-2, is concurrently filing the *Notice of Objection to Your Claim* in response to the Claimants' proofs of claim, attached hereto as **Exhibit C**, and will serve the same upon the Claimants listed in **Schedules 1 – 6** to the Proposed Order.

NOTICE

40. The Trust will provide notice of this Objection to the following parties or their respective counsel: (a) the U.S. Trustee; (b) the Claimants; and (c) any party that has requested notice pursuant to Bankruptcy Rule 2002. The Trust submits that, in light of the nature of the relief requested, no other or further notice need be given.

CONCLUSION

WHEREFORE, the Trust requests entry of an order, substantially in the form attached hereto as **Exhibit A**, granting (a) the relief requested herein, and (b) such other relief as the Court deems appropriate under the circumstances.

Dated: September 18, 2026

KELLEY DRYE & WARREN LLP

/s/ James S. Carr

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Counsel to the Thrasio Legacy Trust

Exhibit A

Proposed Order

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)

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Counsel to the Thrasio Legacy Trust

In re: 1 Thrasio One, Inc. Reorganized Debtor.[1]	Chapter 11 Case No. 24-11850 (CMG)

ORDER SUSTAINING THE SECOND OMNIBUS OBJECTION OF THE THRASIO LEGACY TRUST TO CERTAIN PROOFS OF CLAIM

The relief set forth on the following pages, numbered two (2) through four (4), is **ORDERED**.

[1] The last four digits of Reorganized Debtor's tax identification number are 4771. The Reorganized Debtor's service address for purposes of this chapter 11 case is 85 West Street, 3rd Floor, Walpole, MA, 02081..

Upon the omnibus objection (the "Objection")[1] of the Thrasio Legacy Trust (the "Trust"), requesting entry of an order (this "Order") disallowing and expunging the claims set forth in **Schedules 1 - 6** attached hereto, all as more fully set forth in the Objection; and the Court having jurisdiction to consider the Objection and the relief requested therein pursuant to 28 U.S.C. §§ 157 and 1334 and the *Standing Order of Reference to the Bankruptcy Court Under Title 11* from the United States District Court for the District of New Jersey, entered July 23, 1984, and amended on September 18, 2012 (Simandle, C.J.); and this Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2); and this Court having found that it may enter a final order consistent with Article III of the United States Constitution; and this Court having found that venue of this proceeding and the Objection in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this Court having found that the relief requested in the Objection is in the best interests of the Debtors' estates, their creditors, and other parties in interest; and this Court having found that the Trust's notice of the Objection and opportunity for a hearing on the Objection were appropriate and no other notice need be provided; and this Court having reviewed the Objection and the Kane Declaration and having heard the statements in support of the relief requested therein at a hearing before this Court (the "Hearing"), if any; and this Court having determined that the legal and factual bases set forth in the Objection and at the Hearing, if any, establish just cause for the relief granted herein; and upon all of the proceedings had before this Court; and after due deliberation and sufficient cause appearing therefor, it is **HEREBY ORDERED THAT**:

1. The Objection is sustained as set forth herein.

[1] Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Objection.

2. Each of the Late-Filed Claims identified on **Schedule 1** attached to this Order is hereby disallowed and expunged in its entirety.

3. Each of the Amended and Superseded Claims identified on **Schedule 2** attached to this Order is hereby disallowed and expunged in its entirety, without prejudice to the treatment of any Surviving Claims also identified on **Schedule 2**.

4. Each of the No Liability Claims identified on **Schedule 3** attached to this Order is hereby disallowed and expunged in its entirety.

5. Each of the Insufficient Documentation Claims identified on **Schedule 4** attached to this Order is hereby disallowed and expunged in its entirety.

6. Each of the Satisfied Claims identified on **Schedule 5** attached to this Order is hereby disallowed and expunged in its entirety.

7. Each of the Duplicative Claims identified on **Schedule 6** attached to this Order is hereby disallowed and expunged in its entirety.

8. Kurtzman Carson Consultants, LLC dba Verita Global, the claims and noticing agent appointed in these cases (the "Claims Agent"), is authorized and directed to modify the claims register in accordance with entry of the relief granted in this Order.

9. Notwithstanding the relief granted in this Order and any actions taken pursuant to such relief, nothing in this Order shall be deemed: (a) an implication or admission as to the amount of, basis for, or validity of any particular claim against the Reorganized Debtors or the Trust under the Bankruptcy Code or other applicable nonbankruptcy law; (b) a waiver of the Trust's, the Reorganized Debtors', or any other party in interest's rights to dispute any particular claim on any grounds; (c) a promise or requirement to pay any particular claim; (d) an implication,

admission, or finding that any particular claim is an administrative expense claim, other priority claim or otherwise of a type specified or defined in the Objection or this Order; (e) a modification of the assumption or rejection of any lease or executory contract as set forth in the Confirmation Order and Plan; or (f) a waiver or limitation of the Trust's, the Reorganized Debtors', or any other party in interest's, claims, causes of action, or other rights under the Bankruptcy Code or any other applicable law.

10. Notice of the Objection as provided therein shall be deemed good and sufficient notice of such Objection and the requirements of the Bankruptcy Rules and the Local Rules are satisfied by such notice.

11. The Trust and the Claims Agent are authorized to take all actions necessary to effectuate the relief granted in this Order in accordance with the Objection.

12. This Court retains exclusive jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Order.

Schedule 1

Late-Filed Claims

Claimant	Claim No.	Date Filed	Debtor	GUC Amount	Reason for Disallowance
Amy Morgan Davis	257	10/11/24	Thrasio Holdings, Inc.	BLANK	Claim was filed after the General Bar Date. Accordingly, the Trust believes that this claim should be disallowed and expunged in its entirety. In addition, this claim should be disallowed as (i) a No Liability Claim, for the reasons set forth on Schedule 3 and (ii) as an Insufficient Documentation Claim, for the reasons set forth on Schedule 4.
Robin Powered, Inc.	265	8/19/26	Thrasio Holdings, Inc.	$8,747.50	Claim was filed after the General Bar Date. Accordingly, the the Trust believes that this claim should be disallowed and expunged in its entirety.
Zurich American Insurance Company	174	6/5/24	Thrasio Holdings, Inc.	$1.00	Claim was filed after the General Bar Date. Accordingly, the Trust believes that this claim should be disallowed and expunged in its entirety. In addition, this claim should be disallowed as (i) a No Liability Claim for the reasons set forth on Schedule 3 and as (ii) a Satisfied Claim for the reasons set forth on Schedule 5.

The Trust's Objection does not pertain to any secured, administrative, or priority portions of claims listed herein.

Schedule 2

Amended and Superseded Claims

Claimant	Amended Claim No.	Surviving Claim No.	Debtor	Amended GUC Amount	Surviving GUC Amount	Reason for Disallowance
New York State Dept. of Tax and Finance	5	167	Thrasio, LLC	$7,785.93	$237,683.31	Surviving Claim No. 167* expressly amends and supersedes Amended Claim No. 5. Accordingly, the Trust believes Claim No. 5 should be disallowed and expunged in its entirety.
State of New Jersey - Division of Taxation	35	176	Joss Solutions 2016 Limited	$8,000.00	$0.00	Surviving Claim No. 176 expressly amends and supersedes Claim No. 35. Accordingly, the Trust believes Claim No. 35 should be disallowed and expunged in its entirety.

The Trust's Objection does not pertain to any secured, administrative, or priority portions of claims listed herein.

*Claim No. 167 was subsequently withdrawn by the Claimant.

Schedule 3

No Liability Claims

Claimant	Claim No.	Debtor	GUC Amount	Reason for Disallowance
AIG Property Casualty, Inc., Commerce and Industry Insurance Company, Granite State Insurance Company, Illinois National Insurance Company, Lexington Insurance Company, New Hampshire Insurance Company, and certain other entities related to AIG Property Casualty, Inc.	81	Thrasio Holdings, Inc.	UNLIQUIDATED	Claimant asserts a contingent claim for obligations under certain insurance policies. Since the claim was filed, claimant has not asserted that any of its contingent obligations have materialized. In addition, this claim should also be disallowed as a Satisfied Claim for the reasons set forth on Schedule 5. Accordingly, the Trust believes that there is no liability on account of this claim and that this claim should be disallowed and expunged in its entirety. In addition, this claim should be disallowed as a Satisfied Claim for the reasons set forth on Schedule 5.
Alex Urdea	90	Thrasio Holdings, Inc.	UNLIQUIDATED	Claimant asserts a protective, unliquidated claim for indemnification obligations relating to a draft complaint claimant received in 2024. Claimant, however, has not asserted that any amount is owing with respect to such indemnification obligations. Moreover, Claimant is a "Released Party" and "Releasing Party" under the Plan. *See* Plan, art. I.A. Accordingly, the Trust believes that there is no liability on account of this claim and that this claim should be disallowed and expunged in its entirety.
American Alternative Insurance Corporation	22	Ideastream Consumer Products, LLC	$400,000.00	Claimant asserts a claim "contingent upon claims filed by US Customs and Border Protection" for $400,000.00. To date, (i) no claim has been filed by US Customs and Border Protection or (ii) such claims have been withdrawn. Accordingly, the Trust believes that it has no liability on account of this claim and that this claim should be disallowed and expunged in its entirety.
American Alternative Insurance Corporation	23	Charope, Inc.	$10,250,000.00	Claimant asserts a claim "contingent upon claims filed by US Customs and Border Protection" for $10,250,000.00. To date, (i) no claim has been filed by US Customs and Border Protection or (ii) such claims have been withdrawn. Accordingly, the Trust believes that it has no liability on account of this claim and that this claim should be disallowed and expunged in its entirety.
American Alternative Insurance Corporation	24	Green Cricket LTD	$64,000.00	Claimant asserts a claim "contingent upon claims filed by US Customs and Border Protection" for $64,000.00. To date, either (i) no claim has been filed by US Customs and Border Protection or (ii) such claims have been withdrawn. Accordingly, the Trust believes that it has no liability on account of this claim and that this claim should be disallowed and expunged in its entirety.
Amy Morgan Davis	257	Thrasio Holdings, Inc.	BLANK	Claimant does not assert any claim amount or basis for liability, nor do the Debtors' books and records reflect any liability on account of this claim. Accordingly, the Trust believes that it has no liability on account of this claim and that this claim should be disallowed and expunged in its entirety. In addition, this claim should be disallowed as a (i) Late-Filed Claim for the reasons set forth on Schedule 1 and (ii) an Insufficient Documentation Claim for the reasons set forth on Schedule 4.
Dawn Tober	66	Thrasio Holdings, Inc.	BLANK	Claimant does not assert any claim amount or basis for liability. Additionally, the claim does not appear on Debtors' schedules and claimant does not attach any supporting documentation. Accordingly, the Trust believes that there is no liability on account of this claim and that this claim should be disallowed and expunged in its entirety.
Illinois Department of Revenue	244	Thrasio Holdings, Inc.	$0.00	Claimant asserts a tax claim for $0.00. Since the claim has been filed, claimant has not asserted that any amount is owing. Accordingly, the Trust believes that there is no liability on account of this claim and that this claim should be disallowed and expunged in its entirety.
Kenneth Michael Kansky	55	Thrasio, LLC	$72,800.00	Claimant asserts an employment discrimination claim for $72,800.00. Based on the Debtors' books and records, the claimant was never employed by the Debtors. Additionally, claimant's complaint with the Massachusetts Commission Against Discrimination was dismissed for "insufficient evidence to support a determination of probable cause to credit the allegations of the complaint with respect to all claims in the complaint." Accordingly, the Trust believes that there is no liability on account of this claim and that this claim should be disallowed and expunged in its entirety.
OEC Freight Companies	56	Thrasio Holdings, Inc.	$0.00	Claimant asserts a claim for "[s]ervice" for $0.00. Since the claim has been filed, claimant has not asserted that any amount is owing, nor do the Debtors' books and records indicate any liability due and owing to claimant. Accordingly, the Trust believes that there is no liability on account of this claim and that this claim should be disallowed and expunged in its entirety.
Oregon Department of Revenue	161	Thrasio Holdings, Inc.	$0.00	Claimant asserts a tax claim for $0.00. Since the claim has been filed, claimant has not asserted that any amount is owing, nor do the Debtors' books and records indicate any liability due and owing to claimant. Accordingly, the Trust believes that there is no liability on account of this claim and that this claim should be disallowed and expunged in its entirety.
Rabi Jaber	46	Thrasio Holdings, Inc.	BLANK	Claimant does not assert any claim amount or basis for liability. Additionally, the claim does not appear on Debtors' schedules, nor do the Debtors' books and records indicate any liability due and owing to claimant, and claimant does not attach any supporting documentation. Accordingly, the Trust believes that there is no liability on account of this claim and that this claim should be disallowed and expunged in its entirety. In addition, this claim should be disallowed as an Insufficient Documentation Claim for the reasons set forth on Schedule 4.
Zurich American Insurance Company	174	Thrasio Holdings, Inc.	$1.00	Claimant asserts a protective contingent claim for obligations under certain insurance policies for $1.00. Since the claim has been filed, claimant has not asserted that any of its contingent obligations have materialized. Accordingly, the Trust believes that there is no liability on account of this claim and that this claim should be disallowed and expunged in its entirety. In addition, this claim should be disallowed as (i) a Late-Filed Claim for the reasons set forth in Schedule 1 and as (ii) a Satisfied Claim for the reasons set forth in Schedule 5.

The Trust's Objection does not pertain to any secured, administrative, or priority portions of claims listed herein.

Schedule 4

Insufficient Documentation Claims

Claimant	Claim No.	Debtor	GUC Amount	Reason for Disallowance
Amy Morgan Davis	257	Thrasio Holdings, Inc.	BLANK	Claimant does not assert any claim amount or basis for liability, nor attach any supporting documentation in support of the claim. Accordingly, there is insufficient information to reconcile the claim and the Trust believes that this claim should be disallowed and expunged in its entirety. In addition, this claim should be disallowed as (i) a Late-Filed Claim for the reasons set forth in Schedule 1 and (ii) a No Liability Claim for the reasons set forth in Schedule 3.
Deja Johnson	54	Thrasio Holdings, Inc.	BLANK	Claimant does not assert any claim amount but asserts "services performed" as the basis for liability. Additionally, the claim does not appear on Debtors' schedules and claimant does not attach any supporting documentation. Accordingly, there is insufficient information to reconcile the claim and the Trust believes that this claim should be disallowed and expunged in its entirety.
Disney Consumer Products Inc	70	Thrasio Holdings, Inc.	$37,935.00	Claimant asserts a claim for $37,935.00 and asserts "Guarantees and Royalties" as the basis for liability. However, the claim does not appear on Debtors' schedules and claimant does not attach any supporting documentation. Accordingly, there is insufficient information to reconcile the claim and the Trust believes that this claim should be disallowed and expunged in its entirety.
Gina Mazzotti	44	Kitchen Tools Ltd	$10,000.00	Claimant asserts a claim for $10,000.00 but does not assert any basis for liability. Additionally, the claim does not appear on Debtors' schedules and claimant does not attach any supporting documentation. Accordingly, there is insufficient information to reconcile the claim and the Trust believes that this claim should be disallowed and expunged in its entirety.
Rabi Jaber	46	Thrasio Holdings, Inc.	BLANK	Claimant does not assert any claim amount or basis for liability. Additionally, the claim does not appear on Debtors' schedules and claimant does not attach any supporting documentation. Accordingly, there is insufficient information to reconcile the claim and the Trust believes that this claim should be disallowed and expunged in its entirety. In addition, this claim should be disallowed as a No Liability Claim for the reasons set forth on Schedule 3.
Souleymane Doumbia	123	Thrasio Holdings, Inc.	UNLIQUIDATED	Claimant does not assert any claim amount or basis for liability. Additionally, the claim does not appear on Debtors' schedules and claimant does not attach any supporting documentation. Accordingly, there is insufficient information to reconcile the claim and the Trust believes that this claim should be disallowed and expunged in its entirety.
Tyler Mueller	32	Thrasio Holdings, Inc.	$22,000.00	Claimant asserts a claim for $22,000.00 but does not assert any basis for liability. Additionally, the claim does not appear on Debtors' schedules and claimant does not attach any supporting documentation. Accordingly, there is insufficient information to reconcile the claim and the Trust believes that this claim should be disallowed and expunged in its entirety.
Xiaolin Shen	95	Thrasio Holdings, Inc.	BLANK	Claimant does not assert any claim amount or basis for liability. Additionally, the claim does not appear on Debtors' schedules and claimant does not attach any supporting documentation. Accordingly, there is insufficient information to reconcile the claim and the Trust believes that this claim should be disallowed and expunged in its entirety.

The Trust's Objection does not pertain to any secured, administrative, or priority portions of claims listed herein.

Schedule 5

Satisfied Claims

Claimant	Claim No.	Debtor	GUC Amount	Reason for Disallowance
AIG Property Casualty, Inc. and its Affiliates Identified on the Addendum Hereto	81	Thrasio Holdings, Inc.	UNLIQUIDATED	This claim relates to the Debtors' insurance policies which were assumed by the Reorganized Debtors pursuant to the Plan and Confirmation Order, and as such, this claim was satisfied. *See* Plan, art. V.A.; Main Case, Docket No. 1124 at ¶ 88. In addition, this claim should be disallowed as a No Liability Claim for the reasons set forth on Schedule 3.
APRC Clock Tower Development Owner LLC	61	Thrasio, LLC	$0.00	Claimant asserts a claim under a license agreement. Claimant's license agreement was assumed by the Reorganized Debtors pursuant to the Plan Supplement. *See* Main Case, Docket No. 1103. Accordingly, the Trust believes that this claim was satisfied by assumption and should be disallowed and expunged in its entirety.
Zurich American Insurance Company	174	Thrasio Holdings, Inc.	$1.00	This claim relates to the Debtors' insurance policies which were assumed by the Reorganized Debtors pursuant to the Plan and Confirmation Order, and as such, this claim was satisfied. *See* Plan, art. V.A.; Main Case, Docket No. 1124 at ¶ 88. In addition, this claim should be disallowed as (i) a Late-Filed Claim for the reasons set forth in Schedule 1 and as (ii) a No Liability Claim for reasons set forth in Schedule 3.

The Trust's Objection does not pertain to any secured, administrative, or priority portions of claims listed herein.

Schedule 6

Duplicative Claims

Claimant	Duplicative Claim No.	Surviving Claim No.	Debtor	Duplicative GUC Amount	Surviving GUC Amount	Reason for Disallowance
Christine Benidt	232	231	Autumn Ideas, Inc.	$2,471,000.00	$2,471,000.00	Both Surviving Claim No. 231 and Duplicate Claim No. 232 assert "Oustanding earn-out payments per Asset Purchase Agreement" as a shared basis for liability based on the same contract. Pursuant to paragraph 150 of the Confirmation Order, the respective claimants for Claim Nos. 231, 232, and 234 (Bristols 6, Inc., Christine Benidt, and Danielle Beck) are entitled to a single collective claim based on the Debtors' alleged liability under the contract. *See* Main Case, Docket No. 1124 at ¶ 150. Moreover, pursuant to paragraph 70 of the Confirmation Order, holders of General Unsecured Claims are entitled to a single claim with respect to any particular debt owed. *See* Main Case, Docket No. 1124 at ¶ 70. Accordingly, the Trust believes that Duplicate Claim No. 232 should be disallowed and expunged in its entirety.
Danielle Beck	234	231	Autumn Ideas, Inc.	$2,471,000.00	$2,471,000.00	Both Surviving Claim No. 231 and Duplicate Claim No. 232 assert "Oustanding earn-out payments per Asset Purchase Agreement" as a shared basis for liability based on the same contract. Pursuant to paragraph 150 of the Confirmation Order, the respective claimants for Claim Nos. 231, 232, and 234 (Bristols 6, Inc., Christine Benidt, and Danielle Beck) are entitled to a single collective claim based on the Debtors' alleged liability under the contract. *See* Main Case, Docket No. 1124 at ¶ 150. Moreover, pursuant to paragraph 70 of the Confirmation Order, holders of General Unsecured Claims are entitled to a single claim with respect to any particular debt owed. *See* Main Case, Docket No. 1124 at ¶ 70. Accordingly, the Trust believes that Duplicate Claim No. 234 should be disallowed and expunged in its entirety.

The Trust's Objection does not pertain to any secured, administrative, or priority portions of claims listed herein.

Exhibit B

Kane Declaration

James S. Carr
Connie Y. Choe
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Madison, New Jersey 07940
Telephone: (973) 503-5900
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Email: jcarr@kelleydrye.com
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Lorenzo Marinuzzi (admitted *pro hac vice*)
Doug Mannal (admitted *pro hac vice*)
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Counsel to the Thrasio Legacy Trust

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

In re: 1 Thrasio One, Inc. Reorganized Debtor[1].	Chapter 11 Case No. 24-11850 (CMG)

DECLARATION OF DANA P. KANE
IN SUPPORT OF THE SECOND OMNIBUS OBJECTION
OF THE THRASIO LEGACY TRUST TO CERTAIN PROOFS OF CLAIMS

I, Dana P. Kane, hereby declare as follows pursuant to 28 U.S.C. § 1746:

1. I am an authorized representative of META Advisors LLC, in its capacity as trustee (the "GUC Trustee") of the Thrasio Legacy Trust (the "Trust"), established in the above-captioned chapter 11 cases. I submit this declaration (the "Declaration") for all permissible

[1] The last four digits of Reorganized Debtor's tax identification number are 4771. The Reorganized Debtor's service address for purposes of this chapter 11 case is 85 West Street, 3rd Floor, Walpole, MA, 02081.

purposes under the Bankruptcy Rules, the Federal Rules of Civil Procedure, and the Federal Rules of Evidence in support of the *Second Omnibus Objection of the Thrasio Legacy Trust to Certain Proofs of Claim (Late-Filed, Amended and Superseded, No Liability, Insufficient Documentation, Satisfied, and Duplicative Claims)* (the "Objection").[2]

2. As part of my current position in assisting with Trust's responsibilities under the Plan and the GUC Trust Agreement, I am responsible for certain claims management and reconciliation matters. I am generally familiar with the Debtors' business affairs and books and records that reflect, among other things, the Debtors' liabilities and the amount thereof owed to its creditors as of the Petition Date.

3. I have read the Objection and am directly, or by and through the Trust's advisors, familiar with the information contained therein and the schedules attached thereto.

4. I am authorized to submit this Declaration in support of the Objection. All matters set forth in this Declaration are based on: (a) my personal knowledge; (b) my review of relevant documents; (c) information supplied to me by the Trust's advisors and by others at the Trust's request; or (d) as to matters involving United States bankruptcy law or rules or other applicable laws, my reliance upon the advice of counsel or other advisors to the Trust. If called upon to testify, I could and would testify competently to the facts set forth herein.

5. To the best of my knowledge, information and belief, insofar as I have been able to ascertain after reasonable inquiry, considerable time, and resources have been expended to ensure a high level of diligence in reviewing and reconciling the proofs of claim filed against the Debtors in these cases.

---

[2] Unless otherwise defined herein, capitalized terms used herein shall have the meanings ascribed to them in the Objection.

A. Late-Filed Claims

6. In evaluating the Late-Filed Claims, I reviewed the Objection, confirmed that the Trust's professionals reviewed the Bar Date Order, relevant proofs of claim, and their supporting documentation (if any), and determined that the claims identified on **Schedule 1** to the Proposed Order arose or were deemed to arise before the Petition Date and were not filed by the applicable Bar Date.

7. As such, I believe it is appropriate for the Court to disallow and expunge the Late-Filed Claims.

B. Amended and Superseded Claims

8. In evaluating the Amended and Superseded Claims, I reviewed the Objection, confirmed that the Trust's professionals reviewed the relevant proofs of claim and their supporting documentation (if any), and determined that each Amended and Superseded Claim identified on **Schedule 2** to the Proposed Order was superseded by another claim filed in these cases. The claims listed in the "Amended Claim No." column on **Schedule 2** to the Proposed Order are claims that have been amended by the claims listed in the "Surviving Claim No." column in the same row on **Schedule 2** to the Proposed Order. The Amended and Superseded Claims either (i) identify itself on the face of the proof of claim as amending the Amended Claim by reference to the claim number or filing date of the Amended Claim, or (ii) relate to the same liability as the Amended and Superseded Claim.

9. I note that the claimants will not be prejudiced if the Amended and Superseded Claims are disallowed and expunged, because the claimants will receive the appropriate treatment due to them under the Plan based on the status of their respective surviving claims identified on **Schedule 2** to the Proposed Order, subject to the Trust's right to object to the surviving claims in the future, if warranted.

10. As such, I believe it is appropriate for the Court to disallow and expunge the Amended and Superseded Claims.

C. No Liability Claims

11. In evaluating the No Liability Claims, I reviewed the Objection, confirmed that the Trust's professionals reviewed the relevant Proofs of Claim and their supporting documentation (if any), and determined that each "No Liability Claim" identified on **Schedule 3** of the Proposed Order should be disallowed because (i) the documentation attached to such No Liability Claim, if any, does not provide *prima facie* evidence of the validity and amount of the claim and/or (ii) the Trust cannot ascertain a basis for such claim after a reasonable review of the Debtors' books and records.

12. The reasons for disallowing each No Liability Claim are more-fully set forth under the "Reason for Disallowance" column on **Schedule 3** to the Proposed Order.

13. As such, I believe it is appropriate for the Court to disallow and expunge the No Liability Claims.

D. Insufficient Documentation Claims

14. In evaluating the Insufficient Documentation Claims, I reviewed the Objection, confirmed that the Trust's professionals reviewed the relevant proofs of claim and supporting documentation (if any), and determined that the Trust lacked sufficient information to determine the validity or otherwise reconcile each claim identified on **Schedule 4** to the Proposed Order.

15. The reasons for disallowing each Insufficient Documentation Claim are more-fully set forth under the "Reason for Disallowance" column on **Schedule 4** to the Proposed Order.

16. As such, I believe it is appropriate for the Court to disallow and expunge the Insufficient Documentation Claims.

E. Satisfied Claims

17. In evaluating the Satisfied Claims, I reviewed the Objection, confirmed that the Trust's professionals reviewed the relevant proof of claim, supporting documentation (if any), Debtors' Schedules, and the Plan Documents, and determined that the claims identified on **Schedule 5** to the Proposed Order were satisfied by assumption.

18. As such, I believe it is appropriate for the Court to disallow and expunge the Satisfied Claims.

F. Duplicative Claims

19. In evaluating the Duplicative Claims, I reviewed the Objection, confirmed that the Trust's professionals reviewed the relevant proofs of claim and supporting documentation (if any), and determined that each of the Duplicative Claims identified on **Schedule 6** to the Proposed Order is identical to another claim asserting the same liability in the same amount and priority identified on **Schedule 6** in the column labeled "Surviving Claim No."

20. The reasons for disallowing each Duplicative Claim are more-fully set forth under the "Reason for Disallowance" column on Schedule 6 to the Proposed Order. I note that the claimants will not be prejudiced if the Duplicative Claims are disallowed and expunged, because the claimants will retain their surviving claims identified on **Schedule 6** to the Proposed Order, subject to the Trust's right to object to the surviving claims in the future, if warranted.

21. As such, I believe it is appropriate for the Court to disallow and expunge the Duplicative Claims.

I declare under penalty of perjury that the foregoing statements are true and correct to the best of my knowledge, information, and belief.

Dated: September 18, 2026

/s/ Dana P. Kane
Dana P. Kane

Exhibit C

Claim Objection Notice

UNITED STATES BANKRUPTCY COURT **DISTRICT OF NEW JERSEY**	
Caption in Compliance with D.N.J. LBR 9004-1(b) James S. Carr Connie Y. Choe **KELLEY DRYE & WARREN LLP** 7 Giralda Farms, Suite 340 Madison, NJ 07940 Telephone: (973) 503-5900 Facsimile: (973) 503-5950 Email: jcarr@kelleydrye.com cchoe@kelleydrye.com *-and-* Lorenzo Marinuzzi (admitted *pro hac vice*) Doug Mannal (admitted *pro hac vice*) Jamie A. Levitt Theresa A. Foudy (admitted *pro hac vice*) J. Alexander Lawrence (admitted *pro hac vice*) **MORRISON & FOERSTER LLP** 250 West 55th Street New York, New York 10019-9601 Telephone: (212) 468-8000 Facsimile: (212) 468-7900 Email: lmarinuzzi@mofo.com dmannal@mofo.com jlevitt@mofo.com tfoudy@mofo.com alawrence@mofo.com *Counsel to the Thrasio Legacy Trust*	
In re: 1 Thrasio One, Inc. Reorganized Debtor.[1]	Chapter 11 Case No. 24-11850 (CMG)

NOTICE OF OBJECTION TO YOUR CLAIM

TO: THE HOLDERS OF CLAIMS AND THEIR COUNSEL (IF ANY) SET FORTH ON EXHIBIT A HERETO

The Thrasio Legacy Trust (the "Trust") has filed the enclosed *Second Omnibus Objection of the Thrasio Legacy Trust to Certain Proofs of Claim (Late-Filed, Amended and Superseded, No*

[1] The last four digits of Reorganized Debtor's tax identification number are 4771. The Reorganized Debtor's service address for purposes of this chapter 11 case is 85 West Street, 3rd Floor, Walpole, MA, 02081..

Liability, Insufficient Documentation, Satisfied, and Duplicative Claims) (the "Objection") which seeks to alter your rights by disallowing and expunging your claim as set forth in the Objection.

If you disagree with the Objection, you must file a response to the Objection with the Clerk of the Bankruptcy Court at the address below on or before **October 13, 2026**.

At the same time, you must also serve a copy of the response upon the Trust's attorneys:

James S. Carr
Connie Y. Choe
KELLEY DRYE & WARREN LLP
7 Giralda Farms, Suite 340
Madison, New Jersey 07940
Telephone: (973) 503-5900
Facsimile: (973) 503-5950
Email: jcarr@kelleydrye.com
cchoe@kelleydrye.com

If you file a response, you or your attorney must appear at a hearing on the objection that will be held before the Honorable Judge Christine M. Gravelle on **October 20, 2026 at 10:00 a.m. (ET)** at the United States Bankruptcy Court for the District of New Jersey, Clarkson S. Fisher U.S. Courthouse, 402 East State Street, Trenton, NJ 08608, Courtroom #3.

IF YOU DO NOT RESPOND TO THE OBJECTION, THE COURT MAY GRANT THE RELIEF DEMANDED BY THE OBJECTION WITHOUT FURTHER NOTICE OR HEARING.

Schedule 1

Late-Filed Claims

Claimant	Claim No.	Date Filed	Debtor	GUC Amount	Reason for Disallowance
Amy Morgan Davis	257	10/11/24	Thrasio Holdings, Inc.	BLANK	Claim was filed after the General Bar Date. Accordingly, the Trust believes that this claim should be disallowed and expunged in its entirety. In addition, this claim should be disallowed as (i) a No Liability Claim, for the reasons set forth on Schedule 3 and (ii) as an Insufficient Documentation Claim, for the reasons set forth on Schedule 4.
Robin Powered, Inc.	265	8/19/26	Thrasio Holdings, Inc.	$8,747.50	Claim was filed after the General Bar Date. Accordingly, the the Trust believes that this claim should be disallowed and expunged in its entirety.
Zurich American Insurance Company	174	6/5/24	Thrasio Holdings, Inc.	$1.00	Claim was filed after the General Bar Date. Accordingly, the Trust believes that this claim should be disallowed and expunged in its entirety. In addition, this claim should be disallowed as (i) a No Liability Claim for the reasons set forth on Schedule 3 and as (ii) a Satisfied Claim for the reasons set forth on Schedule 5.

The Trust's Objection does not pertain to any secured, administrative, or priority portions of claims listed herein.

Schedule 2

Amended and Superseded Claims

Claimant	Amended Claim No.	Surviving Claim No.	Debtor	Amended GUC Amount	Surviving GUC Amount	Reason for Disallowance
New York State Dept. of Tax and Finance	5	167	Thrasio, LLC	$7,785.93	$237,683.31	Surviving Claim No. 167* expressly amends and supersedes Amended Claim No. 5. Accordingly, the Trust believes Claim No. 5 should be disallowed and expunged in its entirety.
State of New Jersey - Division of Taxation	35	176	Joss Solutions 2016 Limited	$8,000.00	$0.00	Surviving Claim No. 176 expressly amends and supersedes Claim No. 35. Accordingly, the Trust believes Claim No. 35 should be disallowed and expunged in its entirety.

The Trust's Objection does not pertain to any secured, administrative, or priority portions of claims listed herein.

*Claim No. 167 was subsequently withdrawn by the Claimant.

Schedule 3

No Liability Claims

Claimant	Claim No.	Debtor	GUC Amount	Reason for Disallowance
AIG Property Casualty, Inc., Commerce and Industry Insurance Company, Granite State Insurance Company, Illinois National Insurance Company, Lexington Insurance Company, New Hampshire Insurance Company, and certain other entities related to AIG Property Casualty, Inc.	81	Thrasio Holdings, Inc.	UNLIQUIDATED	Claimant asserts a contingent claim for obligations under certain insurance policies. Since the claim was filed, claimant has not asserted that any of its contingent obligations have materialized. In addition, this claim should also be disallowed as a Satisfied Claim for the reasons set forth on Schedule 5. Accordingly, the Trust believes that there is no liability on account of this claim and that this claim should be disallowed and expunged in its entirety. In addition, this claim should be disallowed as a Satisfied Claim for the reasons set forth on Schedule 5.
Alex Urdea	90	Thrasio Holdings, Inc.	UNLIQUIDATED	Claimant asserts a protective, unliquidated claim for indemnification obligations relating to a draft complaint claimant received in 2024. Claimant, however, has not asserted that any amount is owing with respect to such indemnification obligations. Moreover, Claimant is a "Released Party" and "Releasing Party" under the Plan. *See* Plan, art. I.A. Accordingly, the Trust believes that there is no liability on account of this claim and that this claim should be disallowed and expunged in its entirety.
American Alternative Insurance Corporation	22	Ideastream Consumer Products, LLC	$400,000.00	Claimant asserts a claim "contingent upon claims filed by US Customs and Border Protection" for $400,000.00. To date, (i) no claim has been filed by US Customs and Border Protection or (ii) such claims have been withdrawn. Accordingly, the Trust believes that it has no liability on account of this claim and that this claim should be disallowed and expunged in its entirety.
American Alternative Insurance Corporation	23	Charope, Inc.	$10,250,000.00	Claimant asserts a claim "contingent upon claims filed by US Customs and Border Protection" for $10,250,000.00. To date, (i) no claim has been filed by US Customs and Border Protection or (ii) such claims have been withdrawn. Accordingly, the Trust believes that it has no liability on account of this claim and that this claim should be disallowed and expunged in its entirety.
American Alternative Insurance Corporation	24	Green Cricket LTD	$64,000.00	Claimant asserts a claim "contingent upon claims filed by US Customs and Border Protection" for $64,000.00. To date, either (i) no claim has been filed by US Customs and Border Protection or (ii) such claims have been withdrawn. Accordingly, the Trust believes that it has no liability on account of this claim and that this claim should be disallowed and expunged in its entirety.
Amy Morgan Davis	257	Thrasio Holdings, Inc.	BLANK	Claimant does not assert any claim amount or basis for liability, nor do the Debtors' books and records reflect any liability on account of this claim. Accordingly, the Trust believes that it has no liability on account of this claim and that this claim should be disallowed and expunged in its entirety. In addition, this claim should be disallowed as a (i) Late-Filed Claim for the reasons set forth on Schedule 1 and (ii) an Insufficient Documentation Claim for the reasons set forth on Schedule 4.
Dawn Tober	66	Thrasio Holdings, Inc.	BLANK	Claimant does not assert any claim amount or basis for liability. Additionally, the claim does not appear on Debtors' schedules and claimant does not attach any supporting documentation. Accordingly, the Trust believes that there is no liability on account of this claim and that this claim should be disallowed and expunged in its entirety.
Illinois Department of Revenue	244	Thrasio Holdings, Inc.	$0.00	Claimant asserts a tax claim for $0.00. Since the claim has been filed, claimant has not asserted that any amount is owing. Accordingly, the Trust believes that there is no liability on account of this claim and that this claim should be disallowed and expunged in its entirety.
Kenneth Michael Kansky	55	Thrasio, LLC	$72,800.00	Claimant asserts an employment discrimination claim for $72,800.00. Based on the Debtors' books and records, the claimant was never employed by the Debtors. Additionally, claimant's complaint with the Massachusetts Commission Against Discrimination was dismissed for "insufficient evidence to support a determination of probable cause to credit the allegations of the complaint with respect to all claims in the complaint." Accordingly, the Trust believes that there is no liability on account of this claim and that this claim should be disallowed and expunged in its entirety.
OEC Freight Companies	56	Thrasio Holdings, Inc.	$0.00	Claimant asserts a claim for "[s]ervice" for $0.00. Since the claim has been filed, claimant has not asserted that any amount is owing, nor do the Debtors' books and records indicate any liability due and owing to claimant. Accordingly, the Trust believes that there is no liability on account of this claim and that this claim should be disallowed and expunged in its entirety.
Oregon Department of Revenue	161	Thrasio Holdings, Inc.	$0.00	Claimant asserts a tax claim for $0.00. Since the claim has been filed, claimant has not asserted that any amount is owing, nor do the Debtors' books and records indicate any liability due and owing to claimant. Accordingly, the Trust believes that there is no liability on account of this claim and that this claim should be disallowed and expunged in its entirety.
Rabi Jaber	46	Thrasio Holdings, Inc.	BLANK	Claimant does not assert any claim amount or basis for liability. Additionally, the claim does not appear on Debtors' schedules, nor do the Debtors' books and records indicate any liability due and owing to claimant, and claimant does not attach any supporting documentation. Accordingly, the Trust believes that there is no liability on account of this claim and that this claim should be disallowed and expunged in its entirety. In addition, this claim should be disallowed as an Insufficient Documentation Claim for the reasons set forth on Schedule 4.
Zurich American Insurance Company	174	Thrasio Holdings, Inc.	$1.00	Claimant asserts a protective contingent claim for obligations under certain insurance policies for $1.00. Since the claim has been filed, claimant has not asserted that any of its contingent obligations have materialized. Accordingly, the Trust believes that there is no liability on account of this claim and that this claim should be disallowed and expunged in its entirety. In addition, this claim should be disallowed as (i) a Late-Filed Claim for the reasons set forth in Schedule 1 and as (ii) a Satisfied Claim for the reasons set forth in Schedule 5.

The Trust's Objection does not pertain to any secured, administrative, or priority portions of claims listed herein.

Schedule 4

Insufficient Documentation Claims

Claimant	Claim No.	Debtor	GUC Amount	Reason for Disallowance
Amy Morgan Davis	257	Thrasio Holdings, Inc.	BLANK	Claimant does not assert any claim amount or basis for liability, nor attach any supporting documentation in support of the claim. Accordingly, there is insufficient information to reconcile the claim and the Trust believes that this claim should be disallowed and expunged in its entirety. In addition, this claim should be disallowed as (i) a Late-Filed Claim for the reasons set forth in Schedule 1 and (ii) a No Liability Claim for the reasons set forth in Schedule 3.
Deja Johnson	54	Thrasio Holdings, Inc.	BLANK	Claimant does not assert any claim amount but asserts "services performed" as the basis for liability. Additionally, the claim does not appear on Debtors' schedules and claimant does not attach any supporting documentation. Accordingly, there is insufficient information to reconcile the claim and the Trust believes that this claim should be disallowed and expunged in its entirety.
Disney Consumer Products Inc	70	Thrasio Holdings, Inc.	$37,935.00	Claimant asserts a claim for $37,935.00 and asserts "Guarantees and Royalties" as the basis for liability. However, the claim does not appear on Debtors' schedules and claimant does not attach any supporting documentation. Accordingly, there is insufficient information to reconcile the claim and the Trust believes that this claim should be disallowed and expunged in its entirety.
Gina Mazzotti	44	Kitchen Tools Ltd	$10,000.00	Claimant asserts a claim for $10,000.00 but does not assert any basis for liability. Additionally, the claim does not appear on Debtors' schedules and claimant does not attach any supporting documentation. Accordingly, there is insufficient information to reconcile the claim and the Trust believes that this claim should be disallowed and expunged in its entirety.
Rabi Jaber	46	Thrasio Holdings, Inc.	BLANK	Claimant does not assert any claim amount or basis for liability. Additionally, the claim does not appear on Debtors' schedules and claimant does not attach any supporting documentation. Accordingly, there is insufficient information to reconcile the claim and the Trust believes that this claim should be disallowed and expunged in its entirety. In addition, this claim should be disallowed as a No Liability Claim for the reasons set forth on Schedule 3.
Souleymane Doumbia	123	Thrasio Holdings, Inc.	UNLIQUIDATED	Claimant does not assert any claim amount or basis for liability. Additionally, the claim does not appear on Debtors' schedules and claimant does not attach any supporting documentation. Accordingly, there is insufficient information to reconcile the claim and the Trust believes that this claim should be disallowed and expunged in its entirety.
Tyler Mueller	32	Thrasio Holdings, Inc.	$22,000.00	Claimant asserts a claim for $22,000.00 but does not assert any basis for liability. Additionally, the claim does not appear on Debtors' schedules and claimant does not attach any supporting documentation. Accordingly, there is insufficient information to reconcile the claim and the Trust believes that this claim should be disallowed and expunged in its entirety.
Xiaolin Shen	95	Thrasio Holdings, Inc.	BLANK	Claimant does not assert any claim amount or basis for liability. Additionally, the claim does not appear on Debtors' schedules and claimant does not attach any supporting documentation. Accordingly, there is insufficient information to reconcile the claim and the Trust believes that this claim should be disallowed and expunged in its entirety.

The Trust's Objection does not pertain to any secured, administrative, or priority portions of claims listed herein.

Schedule 5

Satisfied Claims

Claimant	Claim No.	Debtor	GUC Amount	Reason for Disallowance
AIG Property Casualty, Inc. and its Affiliates Identified on the Addendum Hereto	81	Thrasio Holdings, Inc.	UNLIQUIDATED	This claim relates to the Debtors' insurance policies which were assumed by the Reorganized Debtors pursuant to the Plan and Confirmation Order, and as such, this claim was satisfied. *See* Plan, art. V.A.; Main Case, Docket No. 1124 at ¶ 88. In addition, this claim should be disallowed as a No Liability Claim for the reasons set forth on Schedule 3.
APRC Clock Tower Development Owner LLC	61	Thrasio, LLC	$0.00	Claimant asserts a claim under a license agreement. Claimant's license agreement was assumed by the Reorganized Debtors pursuant to the Plan Supplement. *See* Main Case, Docket No. 1103. Accordingly, the Trust believes that this claim was satisfied by assumption and should be disallowed and expunged in its entirety.
Zurich American Insurance Company	174	Thrasio Holdings, Inc.	$1.00	This claim relates to the Debtors' insurance policies which were assumed by the Reorganized Debtors pursuant to the Plan and Confirmation Order, and as such, this claim was satisfied. *See* Plan, art. V.A.; Main Case, Docket No. 1124 at ¶ 88. In addition, this claim should be disallowed as (i) a Late-Filed Claim for the reasons set forth in Schedule 1 and as (ii) a No Liability Claim for reasons set forth in Schedule 3.

The Trust's Objection does not pertain to any secured, administrative, or priority portions of claims listed herein.

Schedule 6

Duplicative Claims

Claimant	Duplicative Claim No.	Surviving Claim No.	Debtor	Duplicative GUC Amount	Surviving GUC Amount	Reason for Disallowance
Christine Benidt	232	231	Autumn Ideas, Inc.	$2,471,000.00	$2,471,000.00	Both Surviving Claim No. 231 and Duplicate Claim No. 232 assert "Oustanding earn-out payments per Asset Purchase Agreement" as a shared basis for liability based on the same contract. Pursuant to paragraph 150 of the Confirmation Order, the respective claimants for Claim Nos. 231, 232, and 234 (Bristols 6, Inc., Christine Benidt, and Danielle Beck) are entitled to a single collective claim based on the Debtors' alleged liability under the contract. *See* Main Case, Docket No. 1124 at ¶ 150. Moreover, pursuant to paragraph 70 of the Confirmation Order, holders of General Unsecured Claims are entitled to a single claim with respect to any particular debt owed. *See* Main Case, Docket No. 1124 at ¶ 70. Accordingly, the Trust believes that Duplicate Claim No. 232 should be disallowed and expunged in its entirety.
Danielle Beck	234	231	Autumn Ideas, Inc.	$2,471,000.00	$2,471,000.00	Both Surviving Claim No. 231 and Duplicate Claim No. 232 assert "Oustanding earn-out payments per Asset Purchase Agreement" as a shared basis for liability based on the same contract. Pursuant to paragraph 150 of the Confirmation Order, the respective claimants for Claim Nos. 231, 232, and 234 (Bristols 6, Inc., Christine Benidt, and Danielle Beck) are entitled to a single collective claim based on the Debtors' alleged liability under the contract. *See* Main Case, Docket No. 1124 at ¶ 150. Moreover, pursuant to paragraph 70 of the Confirmation Order, holders of General Unsecured Claims are entitled to a single claim with respect to any particular debt owed. *See* Main Case, Docket No. 1124 at ¶ 70. Accordingly, the Trust believes that Duplicate Claim No. 234 should be disallowed and expunged in its entirety.

The Trust's Objection does not pertain to any secured, administrative, or priority portions of claims listed herein.